



UNITED STATES  
SECURITIES AND EXCHANGE COMMISSION  
BROOKFIELD PLACE, 200 VESEY STREET, SUITE 400  
NEW YORK, NY 10281-1022

August 17, 2021

**By ECF**

Hon. Kenneth M. Karas  
United States District Court  
United States Courthouse  
300 Quarropas Street, Chambers 533  
White Plains, New York 10601-4150

Re: *U.S. Securities and Exchange Commission v. Bronson et al.*,  
12-CV-6421 (KMK)

Dear Judge Karas:

I write to seek relief from the Court as Defendant Edward Bronson (“Bronson”) has violated the Court’s July 9 Order, DE 272, to pay the Judgment pursuant to a specified payment plan (“Payment Order”). As background, the Court’s January 19, 2021 Order (“Contempt Order”) found Edward Bronson (“Bronson”) in contempt for failing to pay ordered disgorgement and prejudgment interest. DE 193.

At a hearing to address whether Bronson was complying with the Contempt Order, Bronson agreed to the terms of the Payment Order, which included paying approximately \$12 million. The Court ordered Bronson to make the first \$1.1 million payment by August 13. DE 272. The Order states that “Bronson is solely responsible for making each payment set forth above in full regardless of the value of any brokerage account, any delay by the court appointed liquidator, including a delay in designating a court-appointed liquidator, or any other issue that arises.” The Court further ordered Bronson to inform the Court and the Commission *immediately* if he fails to make any payment in full by the due date. *Id.* What’s more, the Order requires Bronson to file proof of all payments on ECF. *Id.*

Commission counsel sought to determine whether Bronson would make the August 13 payment. See e.g. Exhibit A. Bronson’s counsel did not respond until August 16 – and provided scant detail. *Id.* Then, three days after the payment was due, Bronson filed a letter with the Court claiming he had mailed a \$200,000 payment. DE 276. Thus, Bronson has violated the Court’s July 9 Order by, among other things, paying \$900,000 less than ordered.

The Commission respectfully requests that if Bronson does not promptly *fully* comply with the Court’s July 9 Order that the Court impose additional sanctions.

Respectfully submitted,  
s/Maureen Peyton King